

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEBRASKA**

NADIA BIGLARI,

PLAINTIFF,

v.

UNIVERSITY OF NEBRASKA
LINCOLN, *et al.*

DEFENDANTS.

CASE NO. 4:22-cv-03268-SMB

**PLAINTIFF’S UNOPPOSED MOTION FOR EXTENSION OF TIME
TO RESPOND TO DEFENDANTS’ PARTIAL MOTION TO DISMISS**

NOW COMES Plaintiff NADIA BIGLARI, by and through her attorney,
with this Unopposed Motion for Extension of Time to Respond to Defendants’
Partial Motion to Dismiss and hereby state the following:

1. Defendants filed their Partial Motion to Dismiss pursuant to Fed. R. Civ. P. 12 (b)(1) and 12(b)(6) on April 21, 2023 (ECF 26, 27).
2. Plaintiff’s Response to Defendants’ Motion to Dismiss is currently due on May 12, 2023.
3. Plaintiff’s attorney is legally blind. While accommodations are in place, it takes Mr. Altman considerably longer to read, write and prepare documents.

4. Plaintiff respectfully requests an additional 14-day extension of time to file their Response to Defendants' Partial Motion to Dismiss, making the Response due on or before May 26, 2023.

5. Plaintiff has conferred with the Defendants on the present Motion. Defendants have advised that they will not oppose the Motion.

6. This request is not filed for the purpose of delay, and no party will be prejudiced by the granting of this motion.

WHEREFORE the Plaintiff requests that the Court enter an Order granting and extension of time for Plaintiff to respond to Defendants' Partial Motion to Dismiss (ECF 26, 27), such that the deadline to respond shall be May 26, 2023.

Dated: April 27, 2023

Respectfully Submitted,

/s/ Keith Altman

Keith Altman, Esq.

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Attorney for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that on April 27, 2023, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all parties.

/s/ Keith Altman
Keith Altman, Esq.